

Exhibit 1

Theory of Liability	Claims	Defendants	Alleged Facts
Criminal Conspiracy/ Corruption/ Obstruction	<ul style="list-style-type: none"> Count II (Obstruction of TVPA) Count VI (Substantive Due Process) 	<p>ALL</p> <p>ALL</p> <p>[Counts I (TVPA), III (aiding & abetting), and IV (conspiracy) as to Turner and Sparks only]</p>	<ul style="list-style-type: none"> Witness intimidation, harassment, and retaliation. Destruction and concealment of evidence relating to Williams' crimes. Interfering with former federal prosecutor Kateri Dahl's investigation of Williams' sexual assaults. Interfering with the execution of a federal arrest warrant for Williams. Covering up Williams' crimes by conspiring to terminate Dahl. Evidence that JCPD officers received or took cash from Williams and Female 4.
Unconstitutional Discrimination Towards Female Reporters of Sexual Violence	<ul style="list-style-type: none"> Count V (Equal Protection Claim) 	<ul style="list-style-type: none"> Defendant City and Defendant Officers in their official capacities 	<ul style="list-style-type: none"> Discrediting, discounting, and discouraging women reports of sexual violence, including Williams' victims. Failing to document and investigate Williams' victims' reports. Failing to, or delaying in, testing rape kits. Failing to seize or retain evidence from Williams' victims. Failing to interview Williams following victims' reports of sexual assault. Evidence of discriminatory animus towards women on the part of JCPD officers, including sexist comments evidencing victim blaming, and discrediting and improperly dismissing sexual assault reports based on officers' biases towards women.
Negligence	<ul style="list-style-type: none"> Counts VIII (Tennessee Tort Claims Act ("TTCA")); Count IX-X (Negligence—Failure to Train, Failure to Supervise) 	<ul style="list-style-type: none"> Defendant City and (for TTCA claim only) Defendants Turner, Peters, Sparks, and Higgins in their official capacities 	<ul style="list-style-type: none"> Failing to collect evidence or document the collection of evidence from Williams' victims. Failing to interview suspects, including Williams, following victims' reports of sexual assault. Discouraged Williams' victims from working with law enforcement to pursue charges. JCPD supervisors negligently allowing sexual assault cases against Williams to be closed when prosecution was still possible. JCPD investigators negligently and improperly using the "exceptional circumstances" justification in their reporting system to justify closing sexual assault cases against Williams.